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11 *Attorneys for Plaintiff*
12 *Ana Hernandez*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 ANA HERNANDEZ, individually and on
16 behalf of all other similarly situated

17 *Plaintiff,*

18 -against-

19 LEAD YOU LLC, a Nevada Limited
20 Liability Company, and JOSE ANGEL
21 ORTIZ URENO, as an individual

22 *Defendant.*

Case No. 2:25-cv-00412-JCM-DJA

**PLAINTIFF’S MOTION FOR
EXTENSION OF TIME TO FILE
OPPOSITION TO
DEFENDANTS’ MOTION TO
DISMISS**

(FIRST REQUEST)

23 Plaintiff Ana Hernandez (“Plaintiff”) pursuant to LR IA 6-1, with the
24 stipulated consent of, Defendants Lead You LLC and Jose Angel Ortiz Ureno, as an
25 individual (collectively “defendants”), respectfully moves this Court for an Order
26 Extending Time for Plaintiff to file her Opposition to Defendants’ Motion to Dismiss
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1 [Dkt. #5]. This is Plaintiff's first request for an extension of time relative to
2 Defendants' Motion. Plaintiff further states the following in support of this request:

- 3 1. On April 8, 2025, Defendants filed a Motion to Dismiss [Dkt. #5]
- 4 2. On April 1, 2025, attorney for Plaintiff, Michael Yancey entered into a three (3)
5 week trial in another matter, which ended on April 18, 2025. Attorney, Michael
6 Yancey, has not had the ability to diligently compile a sufficient response to
7 Defendants' Motion to Dismiss.
8 3. On April 21, 2025 Plaintiff reached out to counsel for Defendants regarding the
9 instant Motion for Extension of Time and requested four weeks to file her
10 Opposition.
11 4. On April 21, 2025, Defendants' counsel responded that it did not object to
12 Plaintiff's Opposition deadline being extended by four weeks.
13 5. The parties hereby agree, and Plaintiff respectfully requests that the Court extend
14 the deadline to file her response to Defendants' Motion to Dismiss for an
15 additional four (4) weeks, making her deadline to respond May 20, 2025.
16 6. This extension is necessary to provide Plaintiff and her counsel sufficient time to
17 investigate the motion to dismiss and provide a meaningful response.
18 7. The requested extension of time shall not prejudice Defendants and will not
19 unduly delay this litigation.
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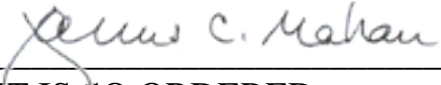
1 8. This is Plaintiff's first request to extend her deadline to respond to the motion to
2
3 dismiss.

4 Dated: April 21, 2025

5 By: /s/ Michael Yancey
6 Michael Yancey III, NV #16158
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17 *Ana Hernandez*

18 Dated: April 23, 2025.

19 
20 _____
21 IT IS SO ORDERED.
22 U.S. DISTRICT JUDGE
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